

AHMEDABAD STEELCRAFT LIMITED

CIN: L27109GJ1972PLC011500

Regd. Office: N.T. 604 ONE-42 Complex, B/h Ashok Vatika, Nr. Jayantilal Park BRTS, Ambli Bopal Road, Ahmedabad - 380058

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COMPLIANCE CERTIFICATE FOR THE SIX MONTHS/ QUARTER ENDED SEPT. 30, 2022 (Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

I, Darshan Ashok Jhaveri Managing Director of the company, have examined the following compliance requirement of Ahmedabad Steel Craft Limited (Company) and certify that the Company has maintained a Structured Digital Database (SDD) pursuant to provisions of Regulation 3(5) and 3(6) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations):

Sr. No	Compliance Requirement	Yes/No	Observation/ Remark
1.	Whether the Company has a Structured Digital Database in place?	<u>Yes</u>	
2.	Whether control exists as to who can access the SDD for read/write alongwith the names and PAN of such person?	<u>Yes</u>	
3.	Whether all the UPSI have been captured in the Database. If not details of events that have not been captured and the reason for the same?	<u>Yes</u>	The Company trading of shares is low and has no UPSI. Therefore there is no trial of information flow digitally.
4.	Whether the recipient were upfront informed that the information which they will be receiving shortly is UPSI and the entry has been captured in the Database prior to forwarding the UPSI data. If not details of events that have not been captured and the reason for the same?	<u>Yes</u>	
5.	Whether nature of UPSI have been captured alongwith date and time?	<u>Yes</u>	
6.	Whether name of persons who have shared the information has been captured along with PAN or any other identifier?	<u>Yes</u>	
7.	Whether name of persons with whom information is shared has been captured along with PAN or any other identifier?	<u>Yes</u>	
8.	Whether the database has been maintained internally?	<u>Yes</u>	
9.	Whether audit trail is maintained?	<u>Yes</u>	
10.	Whether time stamping is maintained?	<u>Yes</u>	
11.	Whether the database is non-tamperable?	<u>Yes</u>	
12.	Any other measures to ensure non-tamperability of the Database?	<u>Yes</u>	

Note: The information of the audit should cover the period when such information was inserted in the SDD upto the date of disclosure.

The number of days for which non-compliance was observed: 0

Further I also confirm that the Company was required to capture 3 number of events during the quarter/half year ended and has captured 3 number of the said required events.

For AHMEDABAD STEEL CRAFT LIMITED

Darshan A Jhaveri

DARSHAN JHAVERI
(MANAGING DIRECTOR)

Compliance Officer (DIN: 00489773)

Date: 10/11/2022 Place: Ahmedabad



Note: The attached certificate should cover events which have been disclosed by the listed entity to the stock exchange so that the secretarial auditor will not be exposed to UPSI.

The Compliance officer Vinita Bhatia has tendered her resignation as Compliance Officer and Company Secretary with effect from 31st October, 2022 and the same will be approved in the Board Meeting Schedule on 14th November, 2022. The Company is in process of appointing Compliance Officer and Company Secretary and SDD will be access by the compliance officer with effect from the date of appointment and Managing Director of the Company. Presently only Managing Director has access the SSD